



Governor Kim Reynolds
Lt. Governor Adam Gregg

Geri D. Huser, Chair
Nick Wagner, Board Member
Richard W. Lozier, Jr., Board Member

June 22, 2018

Dana Wilson
Federal Communications Commission
Consumer and Governmental Affairs Bureau
Disability Rights Office
445 12th Street, SW
Washington, DC 20554

RE: CPNI Compliance CG Docket No. 03-123

Dear Ms. Wilson,

In compliance with the Federal Communication Commission's (FCC) requirements, the Iowa Utilities Board (Board) submits this letter to supplement the previously submitted Telecommunications Relay Service Re-Certification Application certifying compliance with the FCC's Customer Proprietary Network Information (CPNI) minimum requirements. See 47 C.F.R. § 64.5101, et seq.

The Board contracted with Hamilton Relay to operate the state Telecommunications Relay Service (TRS) program also known as Iowa Relay which the Board oversees. The Board affirms the following:

The Iowa Relay program meets all operational, technical, and functional minimum standards as required in 47 C.F.R. §§ 64.604 and 64.604(d) which incorporates by reference the CPNI rules.

The Iowa Relay program is in compliance with all FCC's CPNI standards which are now TRS minimum requirements established in 47 C.F.R. § 64.604(d).

The Iowa Relay program has established procedures and remedies to ensure compliance with the requirements set forth in section 47 C.F.R. §§ 64.5101 through 64.5111 of Commission's rules.

There are no instances in the past year where Hamilton or its agents or subcontractors used, disclosed or permitted access to CPNI without complying with written procedures specified in the *TRS Customer Proprietary Network Information Rules*.

Hamilton has filed its TRS CPNI certification included as Attachment A to this letter stating compliance with the FCC's CPNI requirements, 47 C.F.R. §§ 64.51025 through 64.5111 and in reliance on that certification the Board certifies compliance with the FCC's CPNI requirements.

If you have questions, please contact me at katelyn.lynch-butcher@iub.iowa.gov or (515) 725-7362.

Sincerely,

/s/ Katelyn Lynch-Butcher

Katelyn Lynch-Butcher
Project Manager for Relay Iowa
Iowa Utilities Board
1375 E. Court Avenue
Des Moines, IA 50319-0069

Enc. Attachment A

ATTACHMENT A



1006 Twelfth Street
Aurora, Nebraska 68818
voice/TTY 800.618.4781
fax 402.694.5110
website: www.hamiltonrelay.com
email: info@hamiltonrelay.com

Annual TRS CPNI Certification

CG Docket No. 03-123

Annual Section 64.5109(e) CPNI Certification (covering calendar year 2017)

Date filed: February 27, 2018

Company name: Hamilton Relay, Inc.

Name of signatory: John Nelson

Title of signatory: President of Hamilton Relay, Inc.

I, John Nelson, certify that I am an officer of the company named above, and acting as an agent of the company, that I have personal knowledge that the company has established operating procedures that are adequate to ensure compliance with the Commission's TRS CPNI rules. (*See 47C.F.R. § 64.5101, et seq.*)

Attached to this certification is an accompanying statement explaining how the company's procedures ensure that the company is in compliance with the requirements set forth in section 64.5101 through 64.5111 of the Commission's rules.

The company has not taken any actions against data brokers in the past year.

The company has not received any customer complaints in the past year regarding unauthorized release of CPNI.


There have been no instances in the past year where the company, or its agents or subcontractors, used, disclosed, or permitted access to CPNI without complying with the approval procedures specified in the *TRS Customer Proprietary Network Information Rules*.

Signature:

Name:

Title:

Date:



John Nelson
President of Hamilton Relay, Inc.
2-27-18

COMPLIANCE STATEMENT

Hamilton Relay, Inc. ("*Hamilton*") is a privately owned and operated provider of Telecommunications Relay Services ("*TRS*") to state and national relay programs. Hamilton does not use CPNI to market products or services, and does not share CPNI with affiliates or third parties for their use in marketing services to its customers. Consequently, Hamilton is not required to and does not maintain either an "opt-in" or "opt-out" system with respect CPNI. Customers may subscribe to receive company newsletters, but this information is recorded at the time of subscription and not derived from CPNI.

Hamilton has developed and distributed to all employees a Compliance Manual, which contains policies and procedures to ensure compliance with the FCC's regulations including Hamilton Relay, Inc.'s CPNI policies, which prohibit Hamilton personnel from using, disclosing or accessing any relay customer's CPNI for marketing services to customers. Hamilton requires all Hamilton personnel to complete annual training concerning the treatment of CPNI data. Hamilton's Compliance Manual contains instructions for personnel on how to report noncompliance issues and contains and a specific Form for employees to use to report noncompliance.

Hamilton uses CPNI in very limited situations, all of which are authorized by 47C.F.R. §64.5105(c). Hamilton uses, discloses, or permits access to CPNI for the following reasons:

1. for the provision of CPE, and call answering, voice mail or messaging, and voice mail retrieval services;
2. to accept and handle 911 calls;
3. upon request of the TRS Fund Administrator; and
4. to protect the right or property of Hamilton, TRS user, other TRS providers, and the IRS Fund from fraudulent, abusive, or unlawful use.